

CAFO FACILITY INSPECTION REPORT

OFFICE NO:

PCA SYSTEM TASK NO:

INSPECTOR(S): Anthony D'Angelo (PG Environmental, LLC)

FACILITY INFORMATION

<u>8365130001</u> WDID NUMBER	<u>Martin Verhoeven</u> OWNER NAME	<u>Martin Verhoeven Dairy</u> FACILITY NAME
<u>CAG018001</u> NPDES NUMBER	<u>Ex. 6 Personal Privacy (PP)</u>	
<u>R8-2007-0001</u> RWQCB ORDER NO.	<u>Chino, CA 91710</u> OWNER CITY AND STATE	<u>Chino, CA 91710</u> FACILITY CITY AND STATE
<u>03/08/2013</u> SCHEDULED INSPECTION DATE	<u>Martin Verhoeven</u> OWNER CONTACT	<u>Martin Verhoeven</u> FACILITY CONTACT
<u>03/08/2013</u> ACTUAL INSPECTION DATE	<u>Ex. 6 Personal Privacy (PP)</u>	
<u>Unknown</u> RECEIVING WATER	<u>Ex. 6 Personal Privacy (PP)</u> OWNER PHONE NO.	<u>Ex. 6 Personal Privacy (PP)</u> FACILITY PHONE NO.
	<u>Ex. 6 Personal Privacy (PP)</u> FACILITY LATITUDE	<u>Ex. 6 Personal Privacy (PP)</u> FACILITY LONGITUDE

INSPECTION TYPE

- | | |
|---|---|
| <input type="checkbox"/> (A1) "A" type compliance -- (EPA Type S) | <input type="checkbox"/> (04) Complaint - Complaint |
| <input checked="" type="checkbox"/> (B1) "B" type compliance -- (EPA Type C) | <input type="checkbox"/> (05) Pre-requirement |
| <input type="checkbox"/> (02) Noncompliance follow-up - Correction of a previously identified violation | <input type="checkbox"/> (06) Miscellaneous |
| <input type="checkbox"/> (03) Enforcement follow-up - Enforcement action is being met | |

(Type) **NOTE:** If this is an EPA inspection not mentioned above, please note type (e.g., biomonitoring, performance audit, diagnostic, etc.)

No	Was the inspection pre-announced?
Yes	Were potential violations noted during this inspection?
No	Was this a quality assurance-based inspection?
No	Were bioassay samples collected?
No	Were water quality samples collected?

INSPECTION SUMMARY

The overall Facility rating, on a 1 (Unreliable) to 5 (Very Reliable) scale, was determined to be: 2 = Marginal.

Martin Verhoeven Dairy (hereinafter, Facility) was rated "Marginal" due to the following items:

- Depth markers were not installed in lagoon Nos. 1, 2, and 3 (refer to Photos 16 through 19)
- Annual Reports for the previous five (5) years were not retained or available for review at the time of the inspection
- Weekly Storm Water Management Structure visual inspection documentation was not available for review at the time of the inspection
- Manure Tracking Manifests were not available for review at the time of the inspection
- The Engineered Waste Management Plan (EWMP) was not available for review at the time of the inspection
- The EWMP was not fully implemented onsite at the Facility (i.e., containment structures) (refer to Photos 6, 11, 12, and 13)
- A previous release of manure offsite onto the Eucalyptus Avenue right-of-way was observed along the southern Facility perimeter (refer to Photos 20, 21, and 22)

- A stockpile of skeletal remains (i.e., livestock mortalities) was observed on the northwest side of lagoon No. 2 (refer to Photos 23 through 27)
- Accumulated manure solids were observed in lagoons Nos. 2 and 3 (refer to Photos 10, 11, 16, and 17)

INSPECTOR DATA

INITIALS AJD SIGNATURE _____ DATE 03/08/2013

CIWQS DATA ENTRY DATE: _____ REGIONAL BOARD FILE NUMBER: _____

FOR INTERNAL USE: REVIEWED BY: (1) _____ (2) _____ (3) _____

REPORT PREPARED BY: Anthony D'Angelo (PG Environmental, LLC) ON 03/27/2013

EPA SUGGESTED INSPECTION CHECKLIST

- | | | | |
|--|---|---|--|
| <input checked="" type="checkbox"/> Permit | <input type="checkbox"/> Flow Measurement | <input type="checkbox"/> Pretreatment | <input checked="" type="checkbox"/> Operations & Maintenance |
| <input checked="" type="checkbox"/> Records/Reports | <input type="checkbox"/> Laboratories | <input type="checkbox"/> Compliance Schedules | <input type="checkbox"/> Sludge Disposal |
| <input checked="" type="checkbox"/> Facility Site Review | <input type="checkbox"/> Eff/Receiving Waters | <input type="checkbox"/> Self-Monitoring | <input type="checkbox"/> Other |

POTENTIAL VIOLATIONS

1. Depth markers were not installed in lagoon No. 1, located in the south-central portion of the Facility, or in the northern sections of lagoon Nos. 2 and 3 located in the eastern portion of the Facility, as required by Permit Attachment B - Monitoring and Reporting Program, Section I.B.1 (refer to Photos 16 through 19). Lagoon Nos. 2 and 3 had been divided in half by an east/west earthen berm; therefore, dividing lagoon Nos. 2 and 3 into four (4) separate lagoons (refer to Photos 6, 11, 12, and 13). This is a recurring issue identified in a previous inspection conducted on May 7, 2012.

Description of Potential Violation: **Refer to Item No. 1 of the 'Inspection Observations' section of this report for additional details**

2. The EWMP was not retained onsite or available for review at the time of the inspection as required by Provision VII.C.3.c of the Permit.

Description of Potential Violation: **Refer to Item No. 1 of the 'Engineered Waste Management Plan Review' section of this report for additional details.**

3. The EWMP was not fully implemented onsite and the containment structures had not been adequately maintained at the Facility at the time of the inspection, as required by Provisions VII.C.3.a and Provision VII.C.3.b of the Permit (refer to Photos 6, 11, 12, and 13).

Description of Potential Violation: **Refer to Item Nos. 2 and 3 of the 'Engineered Waste Management Plan Review', section of this report for additional details.**

4. A release of manure offsite to the south onto the Eucalyptus Avenue right-of-way, was observed by the inspector, at the time of the inspection (refer to Photos 20, 21, and 22). A release of manure offsite to land and property not owned or controlled by the Discharger is prohibited by Discharge Prohibitions IV.A-B of the Permit.

Description of Potential Violation: **Refer to item No. 1 of the 'Facility Housekeeping, Wastewater, and Manure Information' section of this report for additional details.**

5. Accumulated manure solids were observed in lagoon Nos. 1, 2, and 3 in the southern and eastern portions of the Facility (refer to Photos 10, 11, 16, and 17). The Discharger must design and maintain all containment structures per the EWMP as required by Provision VII.C.3.a of the Permit.

Description of Potential Violation: **Refer to item No. 3 of the 'Facility Housekeeping, Wastewater, and Manure Information' section of this report for additional details.**

Date of Potential Violation: **N/A**

Date of Potential Violation Determination: **March 8, 2013**

INSPECTION OBSERVATIONS

On March 8, 2013, a Concentrated Animal Feeding Operation (CAFO) inspection was conducted for Santa Ana Water Board Order No. R8-2007-0001 - 'General Waste Discharge Requirements for Concentrated Animal Feeding Operations (Dairies and Related Facilities) within the Santa Ana Region', NPDES General Permit No. (CAG018001) at Martin Verhoeven Dairy in Chino, California (refer to Photo 1). The inspector met with Mr. Martin Verhoeven (Owner, Martin Verhoeven Dairy) at approximately 9:15 AM on March 8, 2013. Mr. Verhoeven stated that he was unable to produce records or participate in the Facility site visit as he was leaving for a doctor's appointment. Mr. Verhoeven provided the name of the Facility operator, Mr. Trino (last name was not provided), and stated he would be able to answer any questions for the inspector. The inspector met with Mr. Trino at approximately 9:30 AM. Mr. Trino (Operator, Martin Verhoeven Dairy) provided information to the inspector about the Facility, but declined to participate in the Facility site visit. A closing conference was not provided to Facility representatives due to their absence at the conclusion of the inspection.

The Facility is a 20-acre dairy farm with an animal population of approximately 600 milking cows, 50 dry cows, and 40 heifers at the time of the inspection. Process wastewater from milking and cow washing activities is collected into a sump on the east side of the milking barn (refer to Photos 2 and 3). Process wastewater collected in the sump is pumped east to a disposal pipe riser structure located between the four (4) containment structures that make up lagoon Nos. 2 and 3 (refer to Photos 13 and 14). It should be noted that the EWMP and Site Plan only identify lagoon Nos. 2 and 3 in the eastern portion of the Facility; however, four (4) containment structures were identified in the eastern portion of the Facility. An east/west earthen berm had been constructed dividing lagoon Nos. 2 and 3 into four (4) separate lagoons (refer to Photos 6, 11, 12, and 13). A disposal pipe was located between the four (4) lagoons to allow process wastewater to be released into any of the four (4) lagoons (refer to Photos 13 and 14). Mr. Trino stated that the pipe is moved to a different lagoon about every three (3) months. At the time of the inspection, process wastewater was actively flowing into the northwestern lagoon (north side of lagoon No. 2) (refer to Photos 13 and 14). Depth markers were present in the southwest and southeast lagoons; however, depth markers were not installed in the northwest or northeast lagoons (refer to Photos 16 and 17). All process wastewater from the milking barn is pumped to the lagoons for evaporation and percolation. The Discharger does not land-apply any wastewater at the Facility. A concrete spillway was identified on the southern embankment of lagoon No. 2, adjacent to Eucalyptus Avenue (refer to Photos 7 and 8). All storm water runoff from the western corrals (corral Nos. 1 and 2) collects into a sump located in the southwest corner of corral No. 2 and is pumped east to the lagoons (refer to Photos 4 and 5). Storm water runoff from the eastern corrals (corral Nos. 3 through 7) flows south into lagoon No. 1 (refer to Photos 18 and 19). Lagoon No. 1 did not contain a depth marker at the time of the inspection (refer to Photo 18). Mr. Trino stated that the lagoons have not been cleaned in the nine (9) years he had been employed at Martin Verhoeven Dairy. Mr. Trino added that Mr. Verhoeven conducts the weekly inspections at the Facility.

Mr. Trino stated that the corrals are cleaned three (3) times per year and that all manure is hauled offsite. Manure is hauled offsite by four (4) different trucking companies; however, the destination was unknown. Manure tracking manifests of all haul events during the 2012 reporting period were not available for review at the time of the inspection. Mr. Trino stated that all mortalities are removed from the Facility immediately by Stiles Animal Removal, Inc.

FACILITY

CAFO Size: **Medium**
(at time of inspection)

Total Acres: **20**

Production Area Acres: **20**

CONTAINMENT STRUCTURES

Wastewater Lagoons: **5**

Evaporation Ponds: **0**

Catch Basins: **0**

Depth Markers: **2**

Other: **N/A**

ANIMALS ONSITE DURING INSPECTION

Milk Cows: **600**

Dry Cows: **50**

Heifers: **40**

Calves: **0**

Other: **N/A**

INSPECTION OBSERVATIONS

1. The inspector observed, during the inspection, that depth markers had not been not installed in lagoon No. 1 located in the southern portion of the Facility, and in the northeast and northwest lagoons (north sides of lagoon Nos. 2 and 3) located in the eastern portion of the Facility as required by the Permit (refer to Photos 16 through 19). It should be noted that the EWMP and Site Plan only identify three (3) lagoons; however, five (5) lagoons were identified at the Facility. Only the southern portions of lagoon Nos. 2 and 3 contained depth markers. An east/west earthen berm had been constructed dividing lagoon Nos. 2 and 3 into four (4) separate lagoons (refer to Photos 6, 11, 12, and 13). Due to the separation berm, the northern sides of lagoon Nos. 2 and 3 had become separate lagoons, and did not contain depth markers. Permit Attachment B - Monitoring and Reporting Program, Section I.B.1 states that "a marker shall be placed within each pond or impoundment to indicate the minimum capacity necessary to contain the runoff and direct precipitation of the 25-year, 24-hour rainfall event."

ANNUAL REPORT REVIEW

ANNUAL REPORT

Monitoring Year: **N/A**

Reviewed: **No**

Signed & Certified: **Unknown**

Submittal Date: **N/A**

REPORTED ANIMAL POPULATION

Milk Cows: **N/A**

Dry Cows: **N/A**

Heifers: **N/A**

Calves: **N/A**

Other: **N/A**

MANURE INFORMATION

Amount of manure spread on cropland at the Facility: **None**

Amount of manure hauled away from the Facility: **Unknown**

Name and location of the composting operation, or, if the manure was hauled to cropland, the owner or tenant, and the destination address: **Unknown**

1. Annual Reports for the previous five (5) years were not available for review at the time of inspection. Mr. Verhoeven stated that all records are maintained in his residence onsite; however, he was not able to produce the records at the time of the inspection due to a doctor's appointment. Permit Attachment B - Monitoring and Reporting Program, Section I.A states "all monitoring data shall be maintained for at least five (5) years and shall be made available to Regional Board, SWRCB, USEPA staff and/or their authorized representatives (including authorized contractor acting as their representative), upon request."
2. Weekly Storm Water Management Structure visual inspection documentation was not available for review at the time of the inspection as required by the Permit. Mr. Verhoeven stated that all records are maintained in his residence onsite; however, he was not able to produce the records at the time of the inspection due to a doctor's appointment. Mr. Trino stated that Mr. Verhoeven is responsible for conducting the weekly inspections at the Facility. Inspection records were unable to be produced at the time of the inspection; therefore, the inspector was unable to determine whether Weekly Storm Water Management Structure visual inspections are conducted at the Facility. Permit Attachment B - Monitoring and Reporting Program, Section I.A states "all monitoring data

shall be maintained for at least five years and shall be made available to Regional Board, SWRCB, USEPA staff and/or their authorized representatives (including an authorized contractor acting as their representative), upon request." In addition, Permit Attachment B - Monitoring and Reporting Program, Section I.B states "all containment structures, including but not limited to, ponds, berms, and wastewater distribution lines, shall be inspected at least once a week during the entire year and at least once each 24-hour period during a storm event in which rainfall exceeds 0.5 inches in 24 hours. The findings of these inspections shall be documented on the attached CAFO Weekly Storm Water Management Structure Inspections Log Sheet (Attachment 1[of the Permit])." The Discharger must make all monitoring data available as required by Permit Attachment B - Monitoring and Reporting Program, Section I.A.

ENGINEERED WASTE MANAGEMENT PLAN (EWMP) REVIEW

Did the inspector review the EWMP in the RWQCB file? **Yes**
Did the Facility have a copy of the EWMP on-site and available for review? **No**
EWMP preparation date: **January 2004**
EWMP prepared by: **Nolte Associates, Inc.**
Santa Ana RWQCB EWMP acceptance date: **August 24, 2004**
EWMP was certified by the Facility's engineer/consultant on: **February 12, 2004**

1. The EWMP was not retained onsite or available for review at the time of the inspection as required by the Permit. Mr. Verhoeven stated that all records (including the EWMP) are maintained in his residence onsite; however, he was not able to produce the records at the time of the inspection due to a doctor's appointment. The inspector was unable to verify whether the EWMP was retained onsite. Provision VII.C.3.c of the Permit states that "a copy of the accepted Engineered Waste Management Plan (EWMP) for the facility shall be maintained on site and the person in charge of the dairy operation shall be familiar with its content."
2. The EWMP was not fully implemented onsite at the Facility or reflective of current Facility conditions as required by the Permit. Section I - 'Introduction' of the EWMP identifies three (3) lagoons at the Facility: Lagoon No. 1 in the southern portion of the Facility, and lagoon Nos. 2 and 3 in the eastern portion of the Facility. The inspector observed, during the inspection, that an east/west earthen berm had been constructed to divide lagoon Nos. 2 and 3 into four (4) separate lagoons (refer to Photos 6, 11, 12, and 13). Provision VII.C.3.b of the Permit states that "the discharger shall develop and fully implement an Engineered Waste Management Plan (EWMP) acceptable to the Executive Officer." Due to the separation of lagoon Nos. 2 and 3 into four (4) separate lagoons, the Discharger was not fully implementing the approved EWMP and Site Plan which only identified a total of three (3) containment structures not five (5) observed at the time of the inspection. The Discharger shall fully implement the EWMP as required by Provision VII.C.3.b of the Permit. This issue was identified in a previous inspection conducted on May 7, 2012.
3. The EWMP was not fully implemented onsite and the containment structures had not been adequately maintained at the Facility as required by the Permit. Section V - 'Operation and Maintenance' of the EWMP states that "lagoon solids shall be removed every summer to ensure full capacity in the lagoons before the start of the next winter season." Mr. Trino stated that the lagoons have not been cleaned in the nine (9) years he has worked at the Facility. The inspector observed that, accumulated solids were prevalent throughout the Facility's lagoons (refer to Photos 10, 11, 16, and 17). As a result of the accumulated solids in the lagoons, the Facility's containment structures capacity may be diminished. Provision VII.C.3.a of the Permit states that "the discharger shall design, construct, and maintain containment structures to retain all wastewater within the facility, including all process wastewater and all precipitation on, and drainage through, manured areas resulting from rainfall up to and including a 25-year, 24-hour rainfall event"; and Provision VII.C.3.b of the Permit states that "the discharger shall develop and fully implement an Engineered Waste Management Plan (EWMP) acceptable to the Executive Officer." The Discharger shall design and maintain all containment structures and fully implement the EWMP as required by Provisions VII.C.3.a and Provision VII.C.3.b of the Permit.

NUTRIENT MANAGEMENT PLAN (NMP) REVIEW (IF APPLICABLE)

Did the Facility have a copy of the NMP on-site and available for review? **N/A**
Date NMP was prepared: **N/A**
NMP prepared by: **N/A**
Santa Ana RWQCB NMP acceptance date: **N/A**

1. The Discharger does not apply manure, litter, or process wastewater to croplands under their ownership or operational control; therefore, the Discharger is not required to develop, implement, and retain onsite a Nutrient Management Plan as stated in Provision VII.C.3.d of the Permit.

FACILITY HOUSEKEEPING, WASTEWATER, AND MANURE INFORMATION

Typical Depth of Manure in Corrals (in inches): **6-8**
Estimated Freeboard in Fullest Lagoon (in feet): **3**
Date of Last Lagoon Solids Removal, per Facility Representative: **Never**
Disposal Location for Lagoon Solids: **N/A**

REVIEW OF FACILITY HOUSEKEEPING

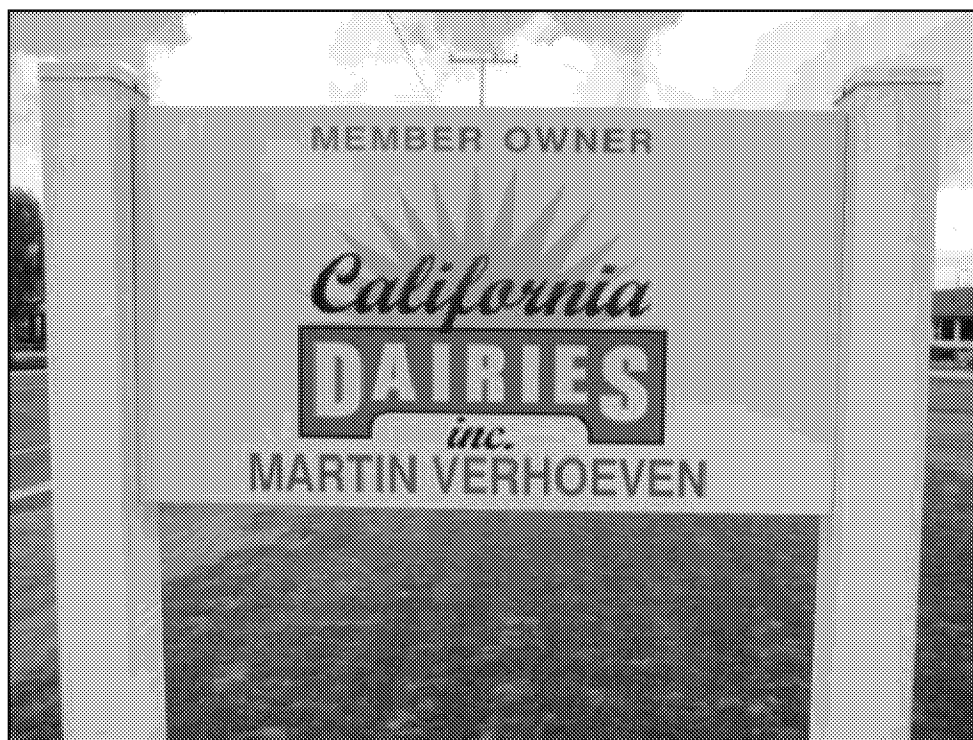
1. The inspector observed, during the inspection, a release of manure offsite to the south from corral No. 7 onto the Eucalyptus Avenue right-of-way (refer to Photos 20, 21, and 22). The inspector did not receive any information regarding the offsite release of manure from the Facility representatives. Discharge Prohibition IV.B of the Permit states "disposal of manure to land is prohibited." In addition, Effluent Limitations and Discharge Specification V.1.a of the Permit specifies that pollutants may be discharged from the Facility if "the production area is designed, constructed, operated, and maintained to contain all manure, litter, and process wastewater including the runoff and the direct precipitation from a 25-year, 24-hour rainfall event."
2. The inspector observed, during the inspection, a soil stockpile containing skeletal remains (i.e., livestock mortalities) on the west side of the northwest lagoon (north side of lagoon No. 2) in the unused dirt area (refer to Photos 23 through 27). The soil stockpile and skeletal remains appeared to be contained onsite; however, storm water runoff from the stockpile most likely would flow south through the eastern corrals and enter lagoon No. 1. Discharge Prohibition IV.F of the Permit states "the disposal of any mortality in any process wastewater system is prohibited. Mortalities shall be handled in such a way as to prevent the discharge of pollutants to waters of the state."

CONDITION OF BERMS AND CONTAINMENT STRUCTURES

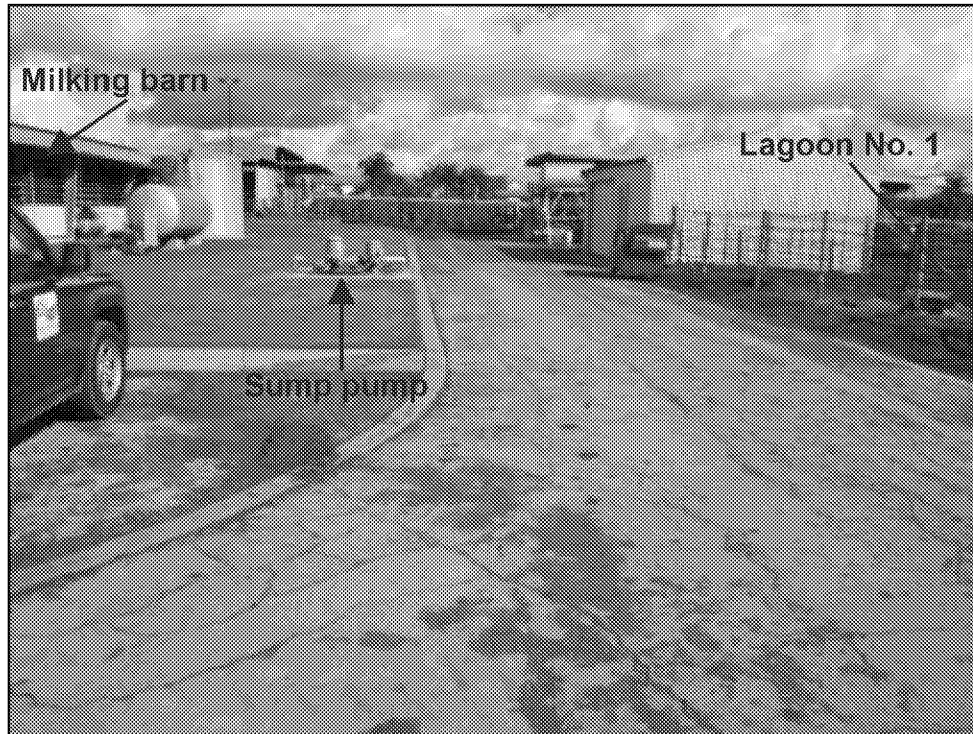
3. The inspector observed, during the inspection, accumulated manure solids in lagoon No. 1 in the southern portion of the Facility, as well as in the four (4) lagoons (identified in the EWMP and Site Plan as lagoon Nos. 2 and 3) (refer to Photos 10, 11, 16, and 17). This finding is addressed in Item No. 3 of the 'Engineered Waste Management Plan Review' section of this report.

ITEMS FOR FOLLOW UP ON FUTURE INSPECTIONS
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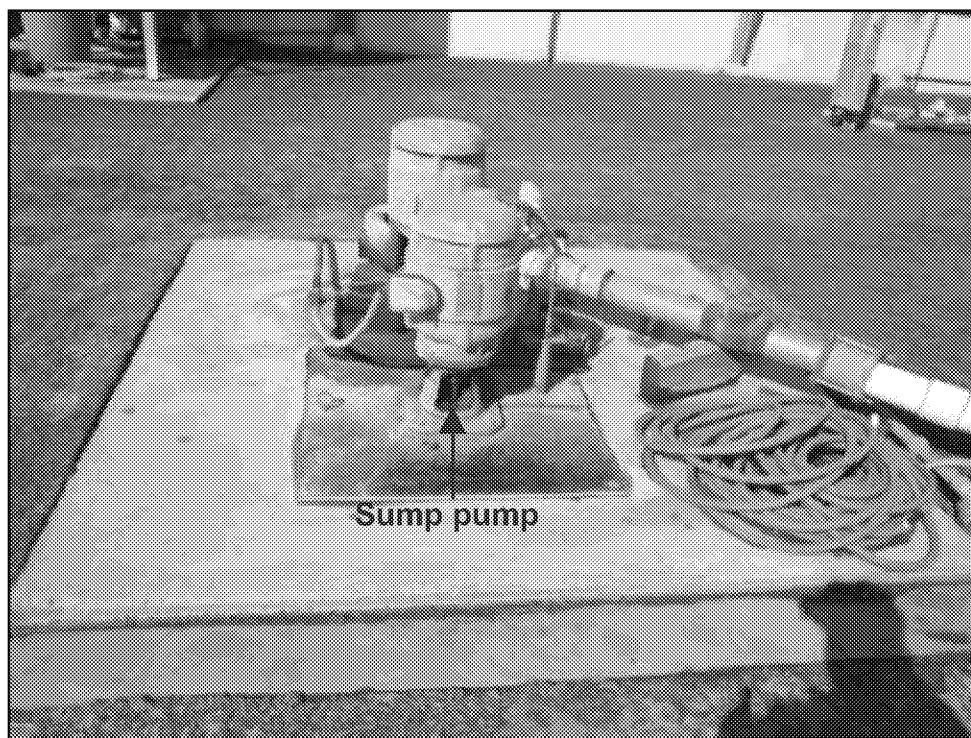
1. Verify whether depth markers have been installed in lagoon Nos. 1, 2, and 3
2. Verify whether the EWMP is retained onsite
3. Verify whether the EWMP is fully implemented onsite
4. Verify whether manure is fully contained onsite
5. Verify appropriate mortality disposal procedures
6. Verify whether containment structures are adequately maintained (e.g., accumulated solids)
7. Verify if Annual Reports and Weekly Storm Water Management Structure visual inspections have been conducted, documented, and retained for the previous five (5) years



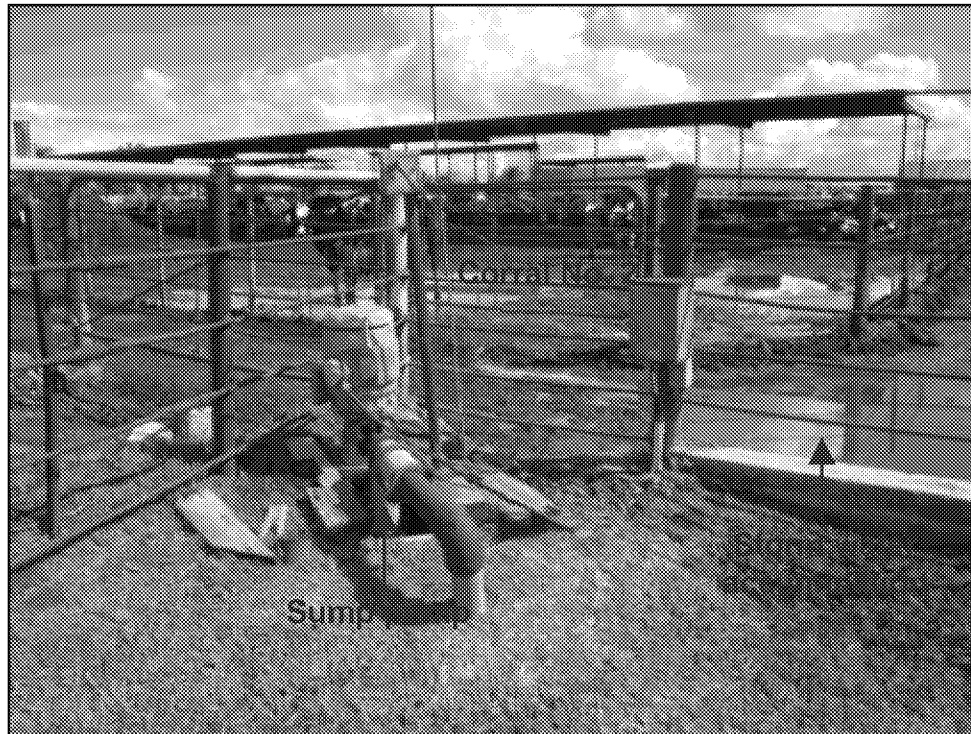
Photograph 1. Martin Verhoeven Dairy Facility sign.



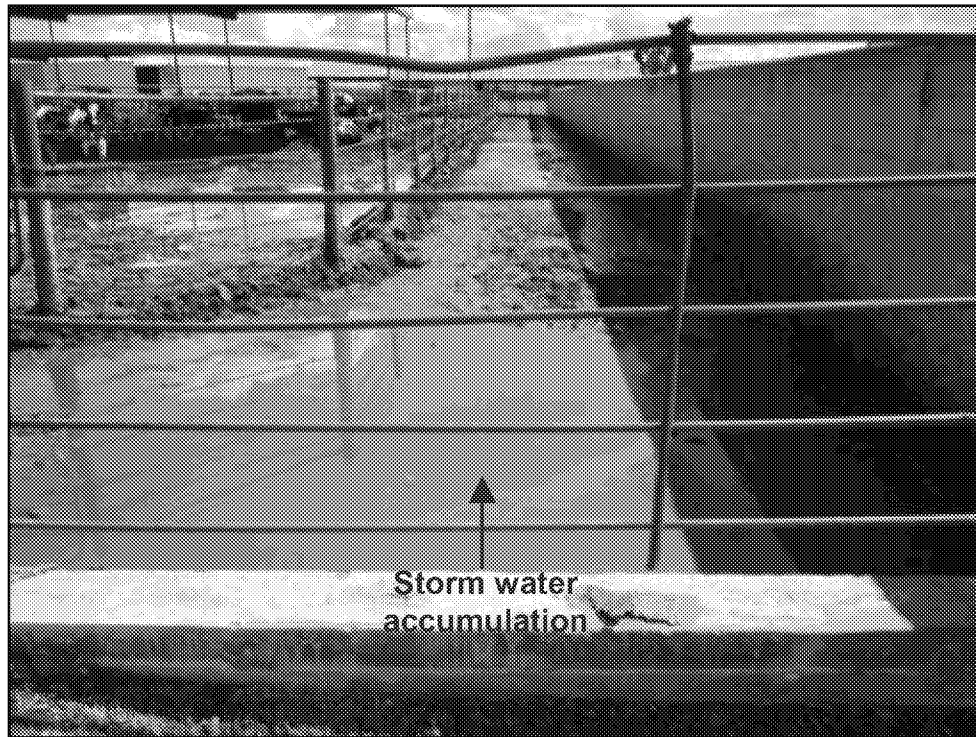
Photograph 2. View facing north of the sump pump located on the east side of the milking barn. The sump pump conveys process wastewater from the milking barn to lagoon Nos. 2 and 3.



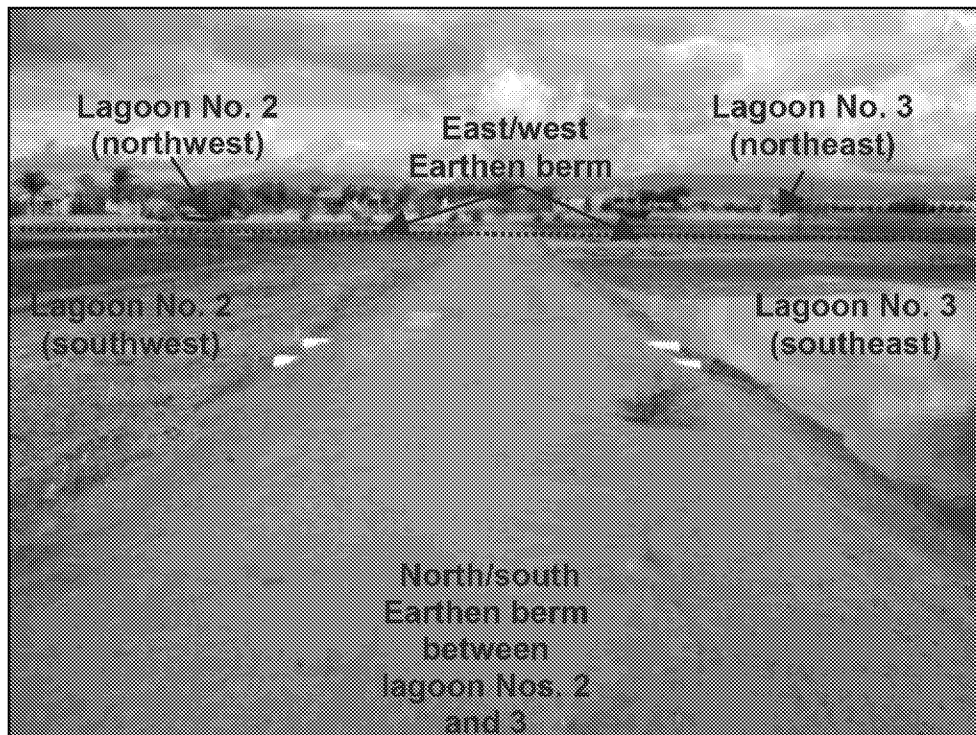
Photograph 3. Close-up view of the sump pump shown in Photograph 2.



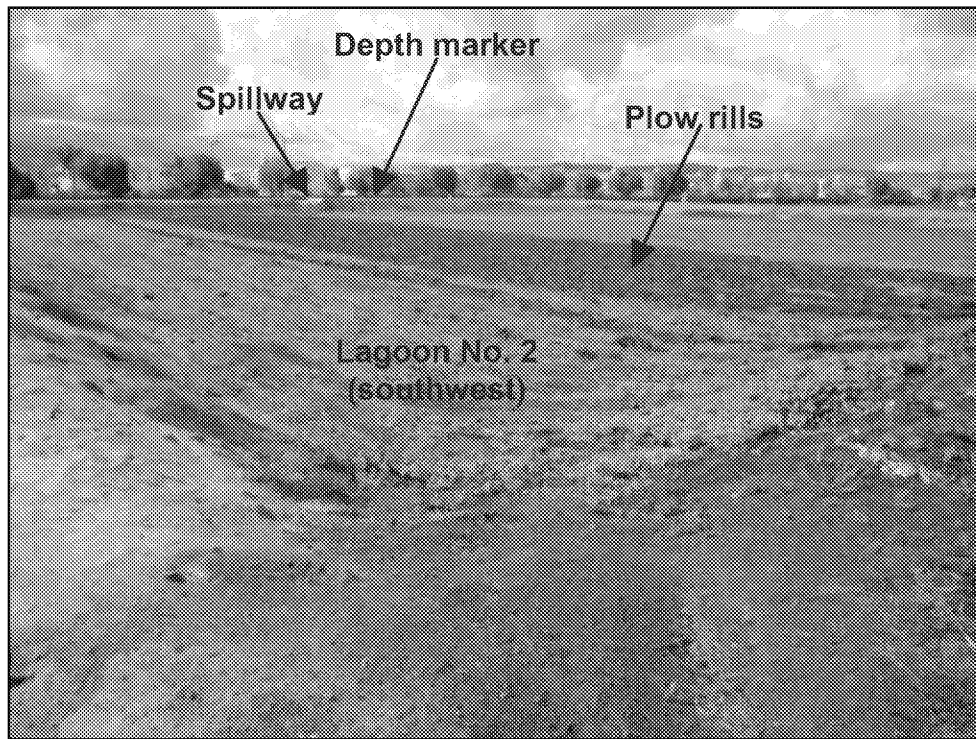
Photograph 4. View facing northeast of a sump pump located on the southwest corner of corral No. 2. Note the sump pump conveys storm water runoff from corral Nos. 1 and 2 to lagoon Nos. 2 and 3.



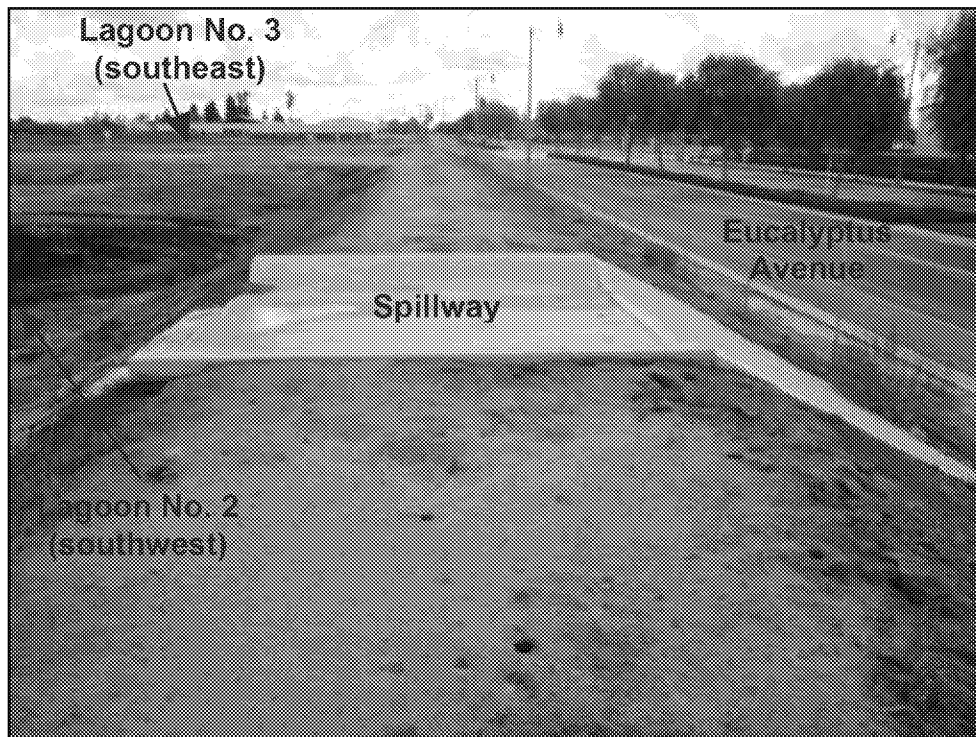
Photograph 5. View facing east from the sump pump shown in Photograph 4 of the accumulated storm water in the southwest corner of corral No. 2.



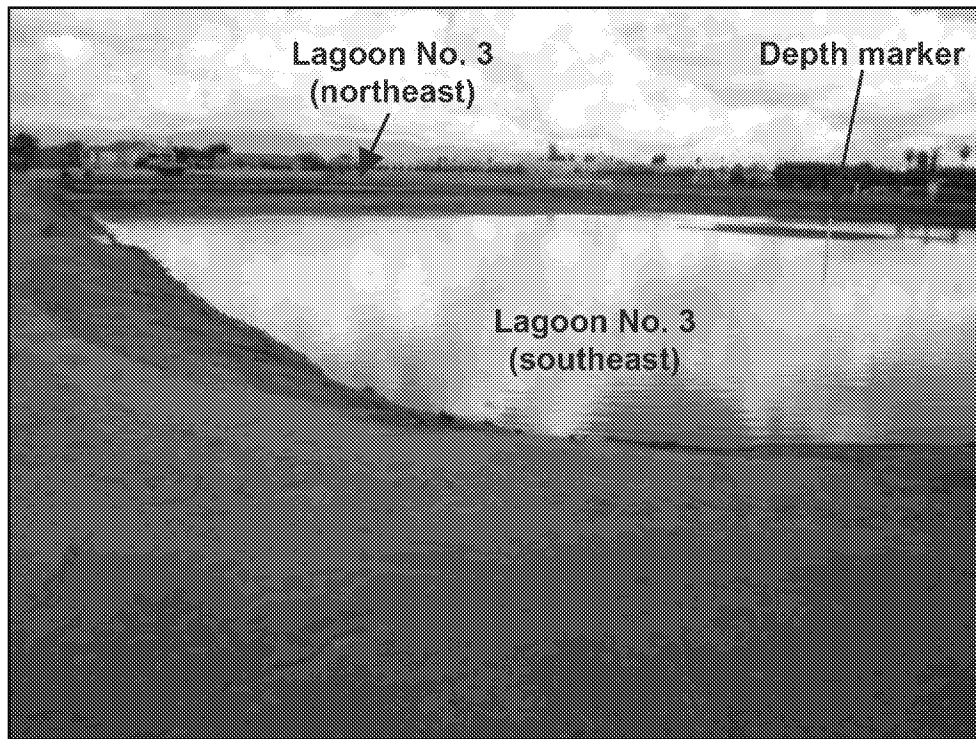
Photograph 6. View facing north from the southern Facility perimeter of lagoon Nos. 2 and 3. Note the lagoons were divided into four (4) separate lagoons by an east/west earthen berm.



Photograph 7. View facing southwest from the intersection of the earthen berms separating the four (4) lagoons near the southwest lagoon portion of lagoon No. 2. Note the lagoon appeared to have been recently plowed and contained a depth marker and spillway on the south side.



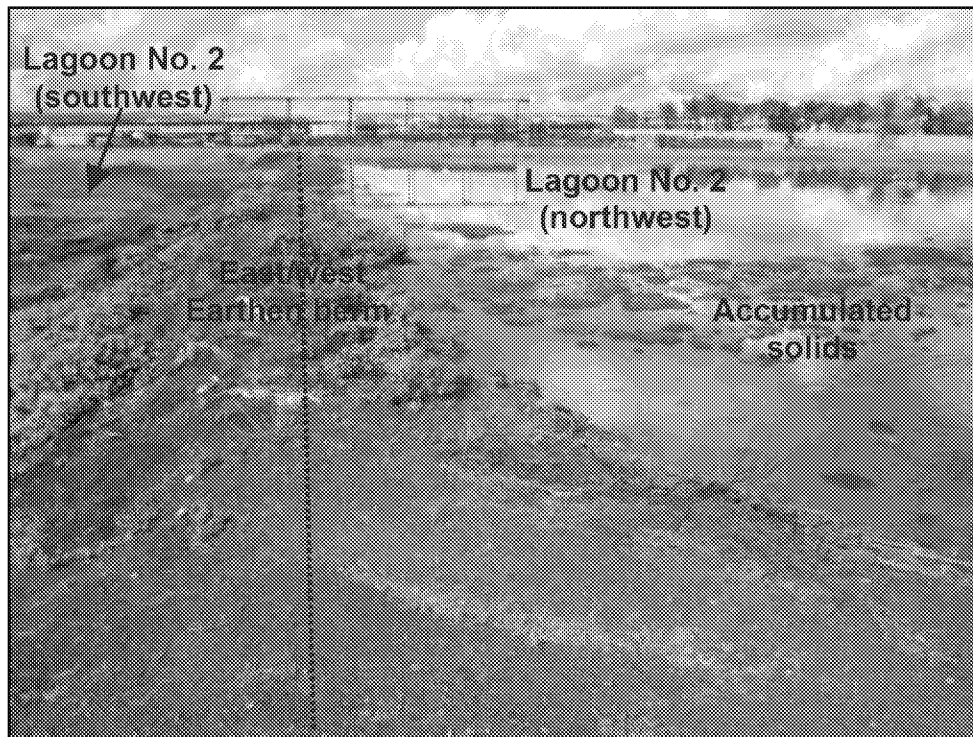
Photograph 8. View facing east of the concrete spillway located on the southern embankment of the southwest portion of lagoon No. 2, adjacent to Eucalyptus Avenue.



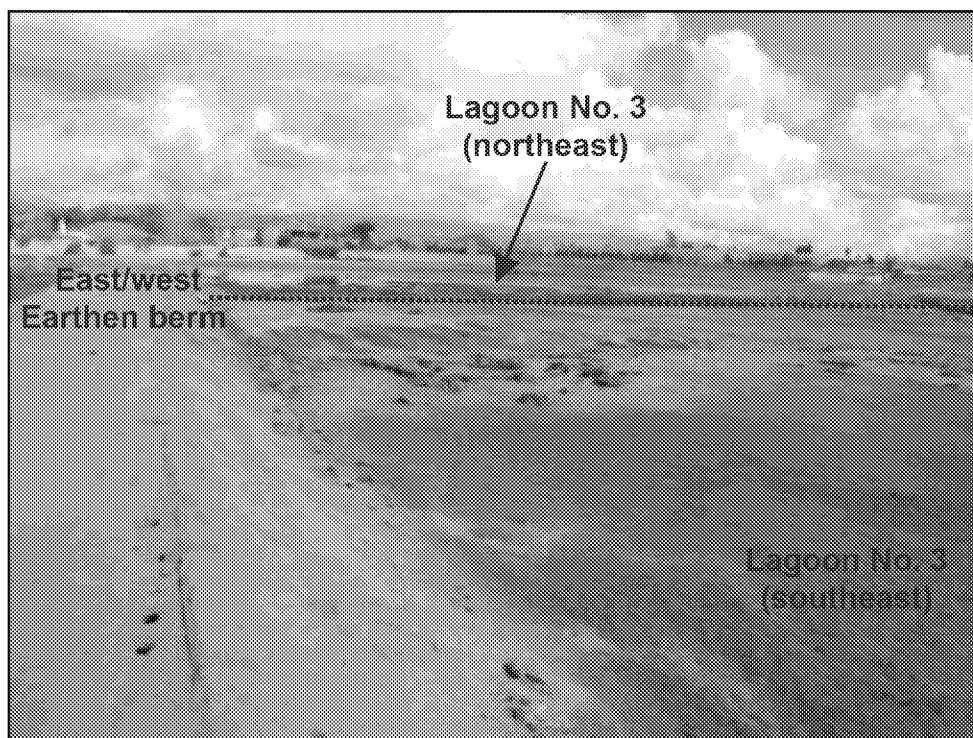
Photograph 9. View facing northeast from the southwest corner of the southeast portion of lagoon No. 3.



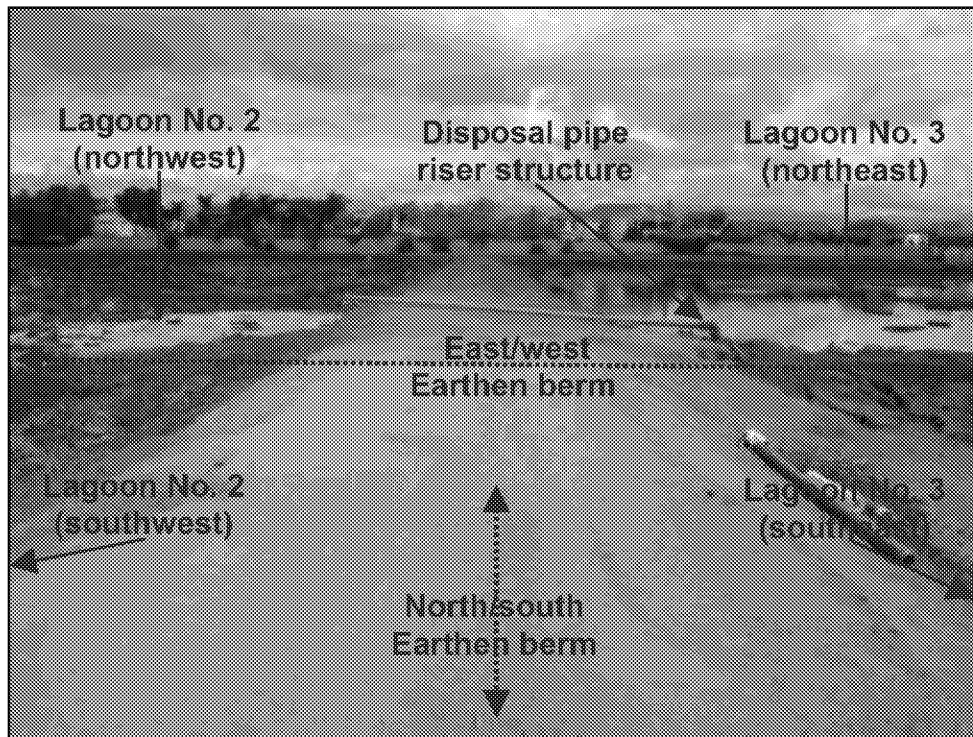
Photograph 10. View facing southeast from the northwest corner of the southeast portion of lagoon No. 3. Note accumulated solids were observed in the lagoon.



Photograph 11. View facing west of the east/west earthen berm that divides lagoon No. 2 into two (2) separate basins. Note the northwestern portion of lagoon No. 2 contained accumulated solids, and the lagoon did not contain a depth marker.



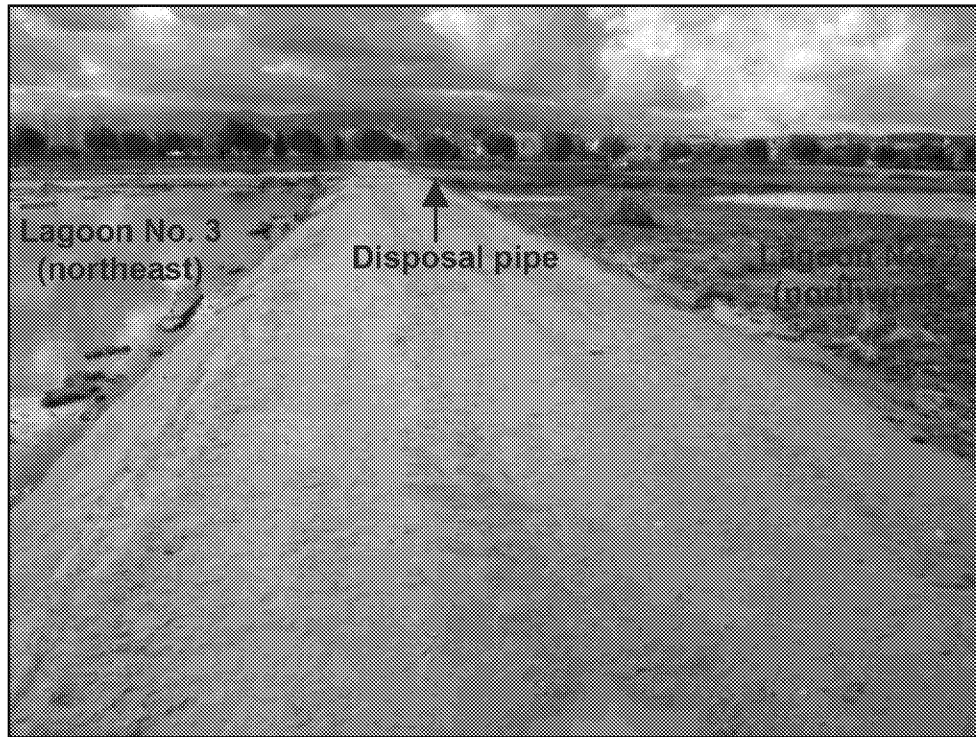
Photograph 12. View facing northeast of the east/west earthen berm that divides lagoon No. 3 into two (2) separate basins. The northeast portion of lagoon No. 3 did not contain a depth marker.



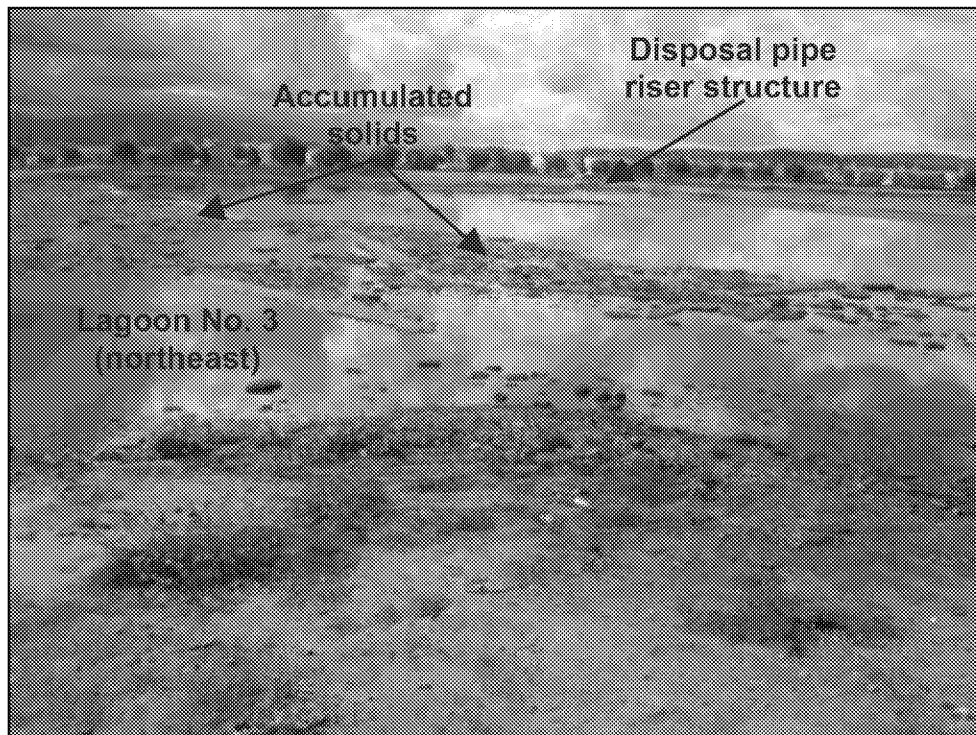
Photograph 13. View facing north of the disposal pipe riser structure located between the lagoons. Note process wastewater was actively flowing into the northwest portion of lagoon No. 2 at the time of the inspection.



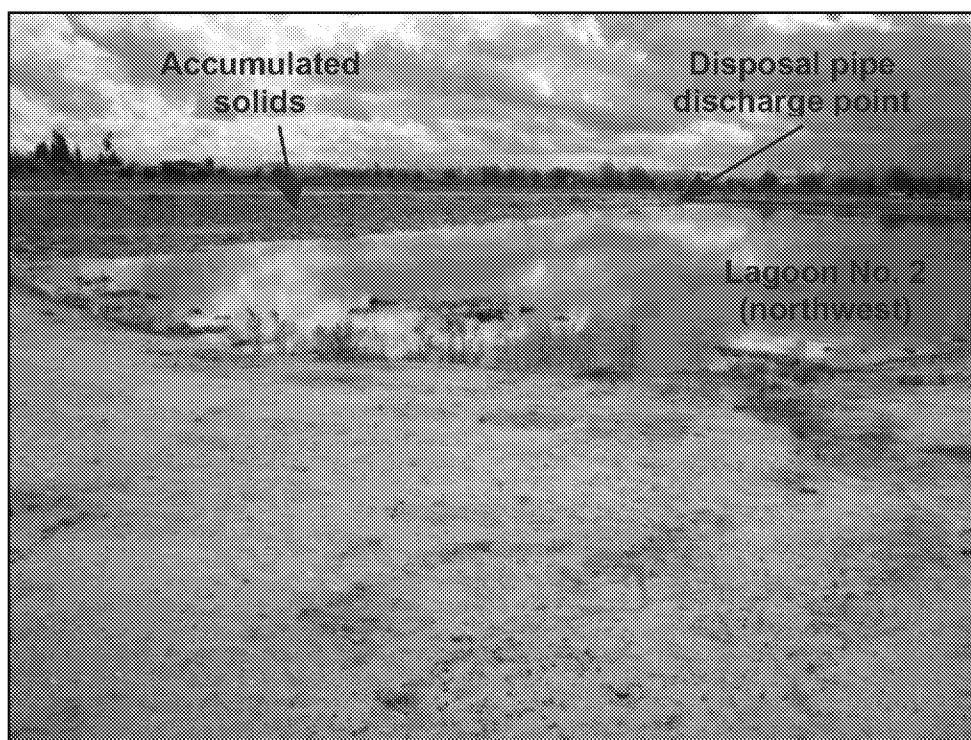
Photograph 14. Close-up view facing northwest of process wastewater actively flowing into the northwest portion of lagoon No. 2 from the disposal pipe.



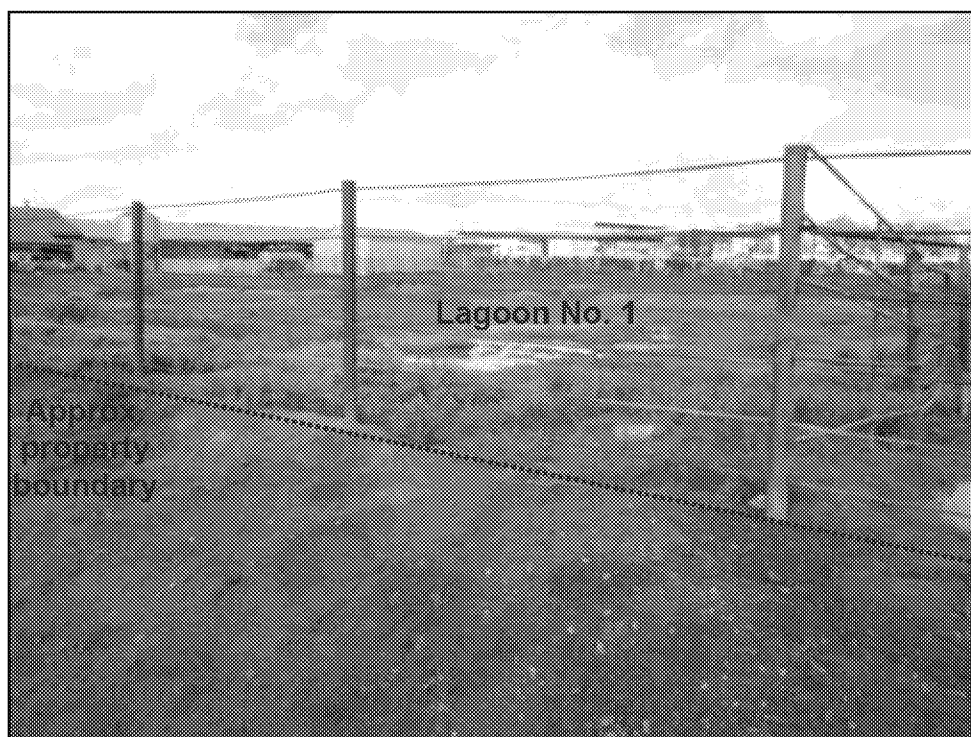
Photograph 15. View facing south from the northern Facility perimeter of the northern portions of lagoon Nos. 2 and 3.



Photograph 16. View facing south of the northeast portion of lagoon No. 3. Note the accumulated solids in the lagoon. Also note the lagoon did not contain a depth marker.



Photograph 17. View facing southeast of the northwest portion of lagoon No. 2. Note the accumulated solids in the lagoon. Also note the lagoon did not contain a depth marker.



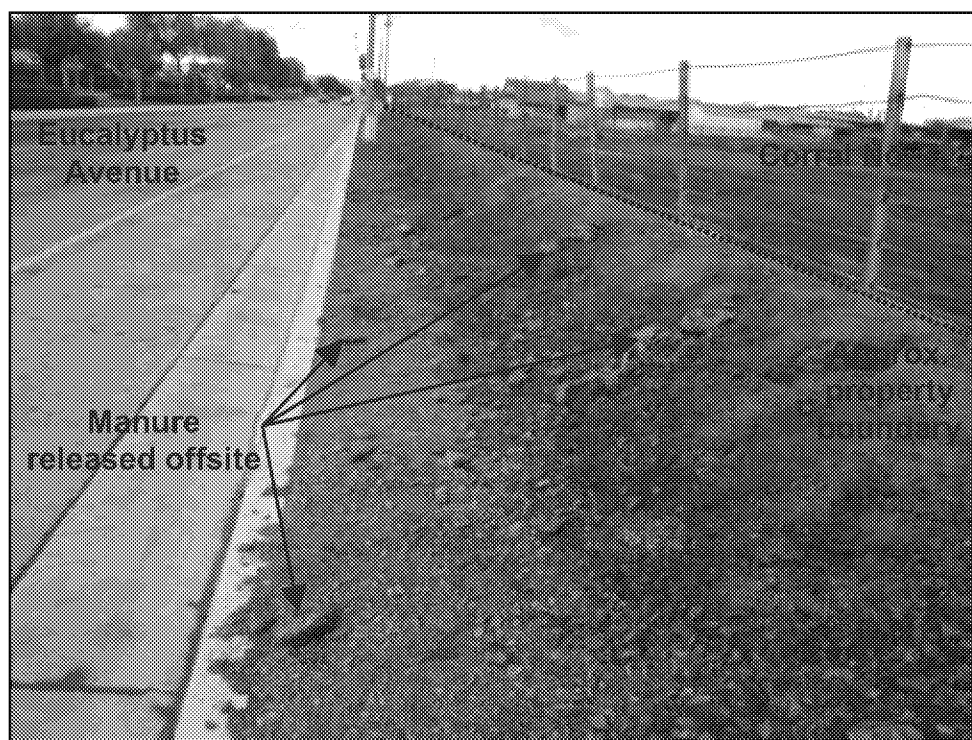
Photograph 18. View facing northwest of lagoon No. 1. Note the lagoon receives storm water runoff from corral Nos. 3 through 7. The lagoon did not contain a depth marker.



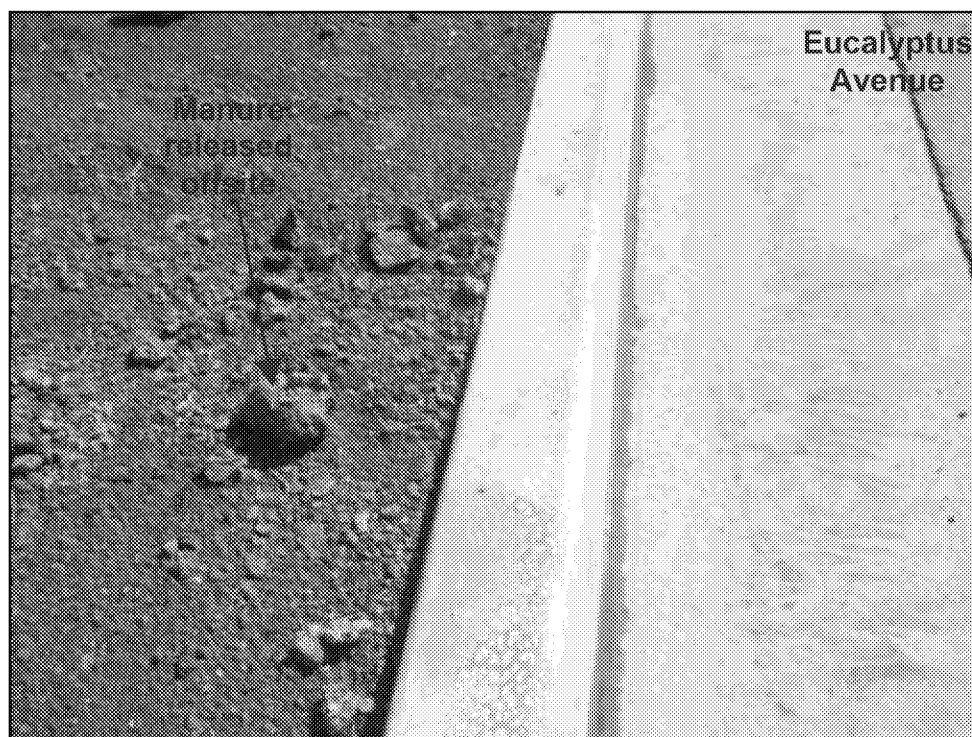
Photograph 19. View facing north of the storm water runoff entrance point from the eastern corrals into the north side of lagoon No. 1. Note the lagoon did not contain a depth marker.



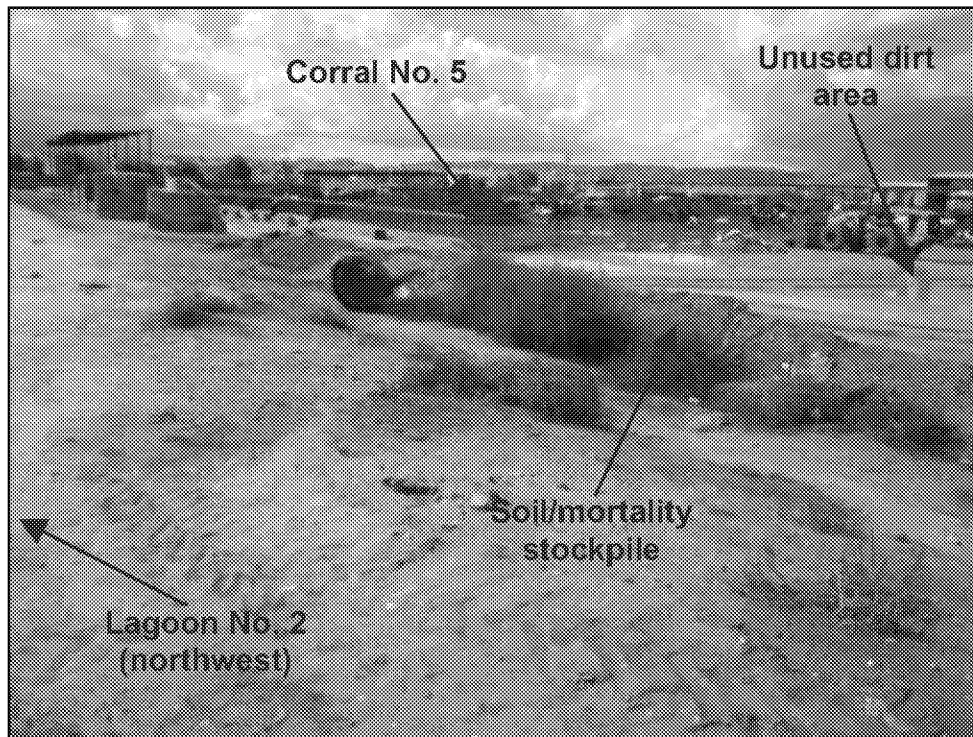
Photograph 20. View facing east of a release of manure offsite to the south from corral No. 7 onto the Eucalyptus Avenue right-of-way.



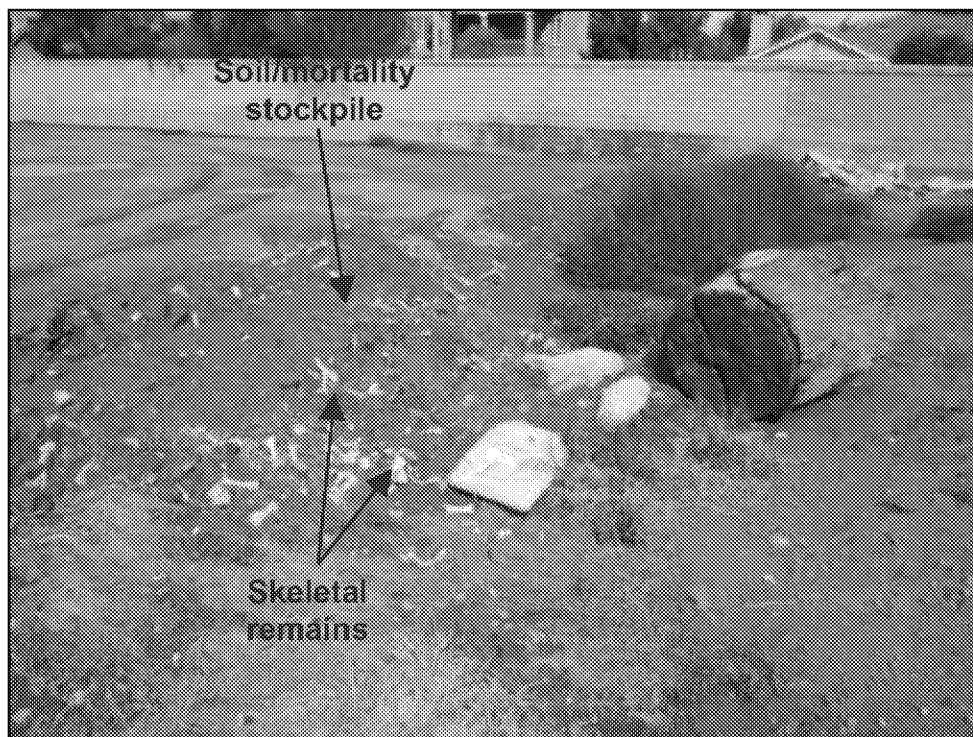
Photograph 21. View facing west of a release of manure offsite to the south from corral No. 7 onto the Eucalyptus Avenue right-of-way.



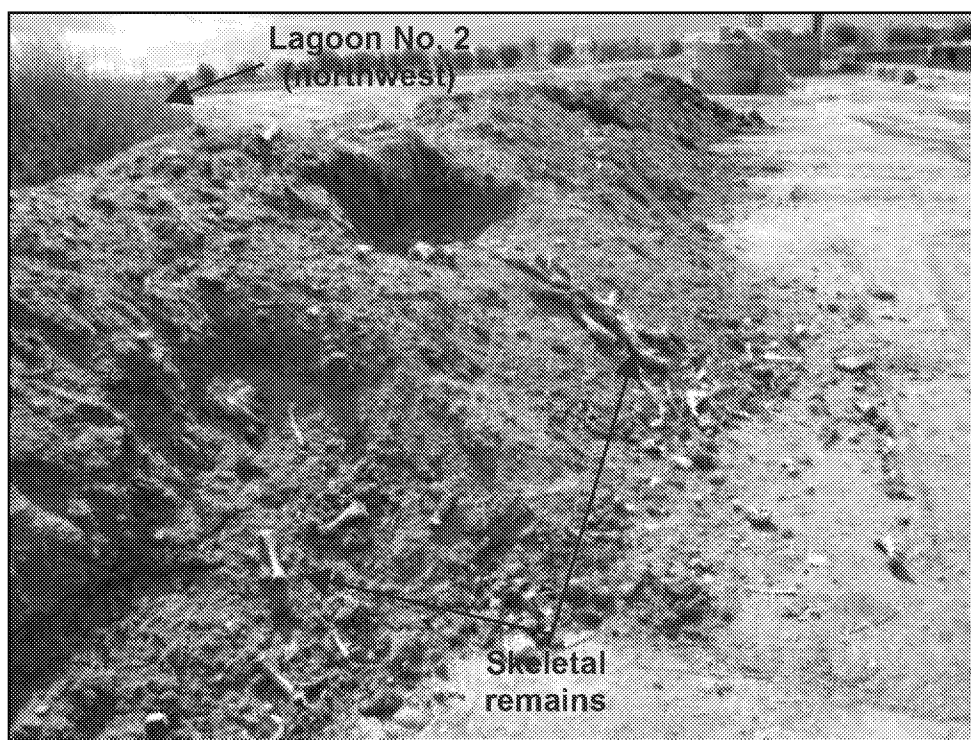
Photograph 22. Close-up view of a release of manure offsite to the south from corral No. 7 onto the Eucalyptus Avenue right-of-way.



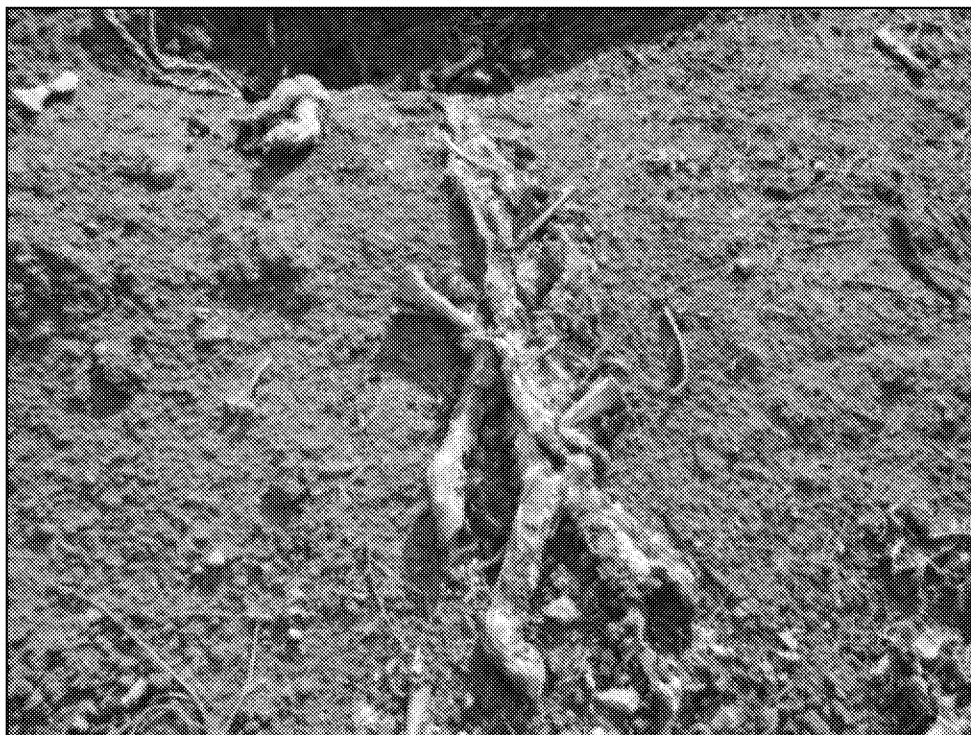
Photograph 23. View facing southwest of a soil stockpile containing livestock skeletal remains in the unused dirt area in the north-central portion of the Facility, adjacent to lagoon No. 2.



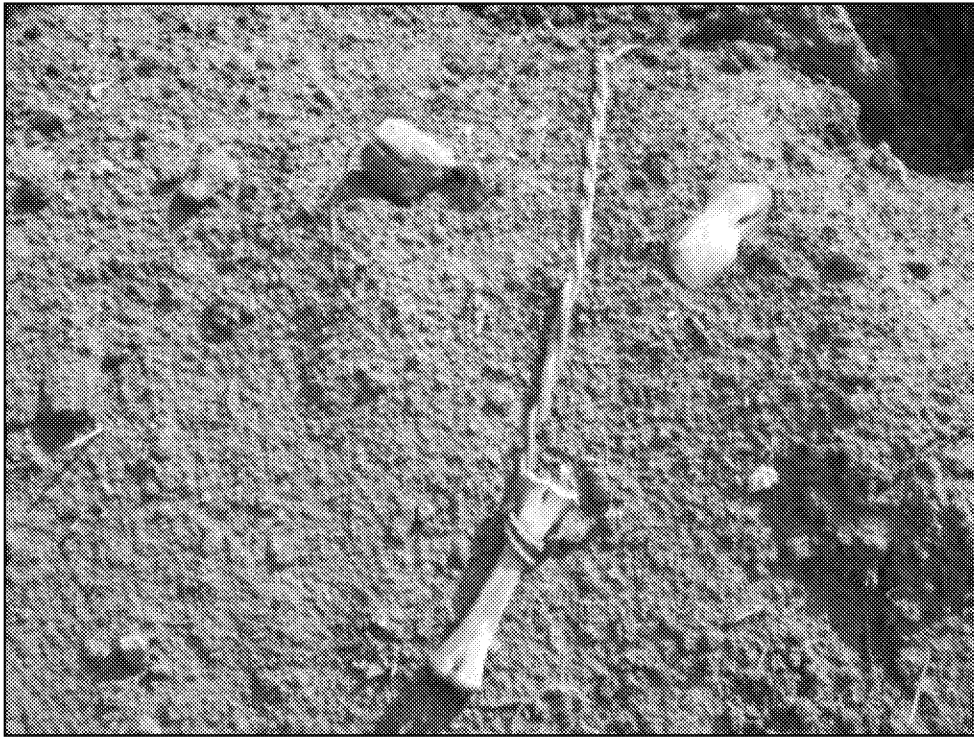
Photograph 24. View facing northwest of skeletal remains in the soil stockpile shown in Photograph 23.



Photograph 25. View facing southeast of skeletal remains in the soil stockpile shown in Photographs 23 and 24.



Photograph 26. Close-up view of skeletal remains shown in Photograph 25.



Photograph 27. Close-up view of skeletal remains in the soil stockpile, shown in Photographs 23 through 26.